

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS MAYES TO INTERROGATORIES OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T37-59, 62)

The United States Postal Service hereby provides responses of witness Mayes to the following interrogatories of United Parcel Service: UPS/USPS-T37-59, 62, filed on September 8, 1997. Interrogatories UPS/USPS-T37-57, 58, 60 and 61 were redirected to the Postal Service.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

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September 22, 1997

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

UPS/USPS-T37-59. Please refer to your response to UPS/USPS-T37-15, and to DMM section E652. Please provide a copy of the zone chart for each Parent Post Office listed in Exhibit 1.5 to DMM section E652 (BMC/ASF Parent Post Offices), and identify the Parent Post Office and zone chart number if not already identified.

Response:

The requested zone charts are being filed as Library Reference H-276.

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

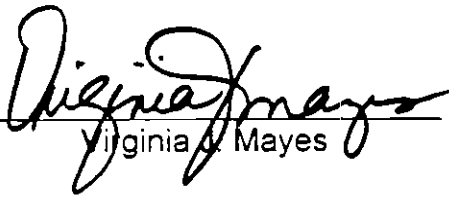
UPS/USPS-T37-62. Please specify the areas in your Workpapers where DSCF rates are identified or calculated.

Response:

I do not believe that the DSCF rates are explicitly calculated in my workpapers. However, they may be calculated by referring to the DBMC rates for Zones 1&2 as found at page 5 and 6 of workpaper WP I.N., subtracting the nontransportation DSCF rate differential found at line (20) of page 1 of workpaper WP I.I., and subtracting the appropriate transportation discount per piece from workpaper WP I.E., pages 9 and 10 (Column AF of worksheet "WP I.E., pages 3-12" of workbook H197-1.XLS of Library Reference H-197).

## DECLARATION

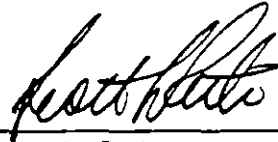
I, Virginia J. Mayes, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
Virginia J. Mayes

Dated: 9-22-97

# **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Scott L. Reiter", is written above a horizontal line.

Scott L. Reiter

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